

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF OKLAHOMA**

UNITED STATES OF AMERICA,)

Plaintiff,)

vs.)

Case No. 22-CR-115-CVE

NICOLE COX,)

Defendant,)

**DEFENDANT NICOLE COX’S MOTION TO JOIN IN
THE UNOPPOSED MOTION TO DECLARE THIS CASE A
COMPLEX MATTER AND EXTEND DEADLINES**

Defendant, Nicole Cox, through counsel, hereby requests to join the Unopposed Motion to Declare this Case a Complex Matter and Extend Deadlines, filed herein. (Doc. 32) In support of said motion Counsel for the Defendant states and alleges as follows:

1. The Defendant, Nicole Cox was Indicted on April 19, 2022. (Doc. 1)
2. On May 26, 2022, Nicole Cox appeared at Arraignment, Entered a Plea of Not Guilty, and waived detention.
3. This Court had previously entered a Scheduling Order on May 24, 2022, setting a Motions deadline of June 3, 2022, and Jury Trial July 11, 2022. (Doc. 56)
3. A Motion to Declare this Case a Complex Matter and Extend Deadlines (Doc. No. 32) was filed on behalf of Defendant’s Jonna Elisa Steele, and Donald B. Pearson.

4. On May 26, 2022 Counsel Michael Noland received an Email advising that the Court was awaiting Speedy Trial Waivers prior to ruling on the Motion. Counsel was further advised that the Discovery in this matter was voluminous.
4. Arguments of Counsel for the Defendants Jonna Elisa Steele, and Donald B. Pearson are similar to that of Counsel Noland in so much that at the current time Michael Noland Counsel has not received discovery and based on the alleged amounts of discovery will not with the exercise of due diligence be able to competently file Pre-Trial Motions in this matter, nor be prepared for trial under the current Scheduling Order.
5. The Speedy Trial Act requires that the trial commence within 70 days, absent period of delay excluded or specific basis defined by the Act. 18 U.S.C. § 3161(c)(1).
6. To the date of filing this motion only four (4) days have run under the Speedy Trial Act
7. The Defendant, Nicole Cox has signed a Waiver of Speedy Trial in agreement with the Continuance of this matter of up to 120 days.

WHEREFORE, Nicole Cox respectfully requests that the Court enter an Order that permits her to join in the Unopposed Motion to Declare this Case a Complex Matter and Extend Deadlines, filed herein. (Doc. 32)

RESPECTFULLY SUBMITTED,

s/Michael W. Noland

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Certificate of Electronic Filing and Service

This is to certify on the 30th day of May 2022, I caused the foregoing to be filed with the Clerk of the Court, using the ECF System for filing, and electronic service was made, via CM/ECF to the following: David A. Nasar, Assistant United States Attorney.

S/ Michael W. Noland

Michael W. Noland